## Document Log Item

| Addressing | |
|---|---|
| **From** | **To** |
| Carmen Santos/R9/USEPA/US | "Conlan, Linda" <Linda.Conlan@amec.com> "Conlan, Linda" <Linda.Conlan@amec.com> |
| **CC** | **BCC** |

| Description | | | Form Used: Reply |
|---|---|---|---|
| **Subject** | | **Date/Time** | |
| Re: PCBs: Former Pechiney Cast Plate Inc - Interim Cap | | 10/05/2010 03:15 PM | |
| **# of Attachments** | **Total Bytes** | **NPM** | **Contributor** |
| 0 | 10,773 | | |
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Body

## Document Body

Hello Linda:

I appreciate the time that you and Bryan Stone took to go over the conceptual approach for the interim cap that you described in your October 1, 2010 message, attached below.

Based on our conversation today, we will resume our dialogue on the interim cap after USEPA has reviewed the information required under the conditional approval of the Pechiney PCB risk-based disposal approval application. I look forward to receiving that information and resuming our dialogue shortly after completing this future review.

Thank you for your courtesies.

Regards,
Carmen

Carmen D. Santos, Project Manager
RCRA Corrective Action Office
Waste Management Division
USEPA Region 9
voice: 415.972.3360
e-mail: santos.carmen@epa.gov
"Tell me and I'll forget, show me and I may not remember, involve me and I'll understand,"
American Indian Proverb

"Conlan, Linda" ---10/01/2010 09:45:44 AM---Carmen, As a follow-up to the voice message I left you earlier this week, we have a few additional q

From: "Conlan, Linda" <Linda.Conlan@amec.com>
To: Carmen Santos/R9/USEPA/US@EPA
Cc: "Stone, Bryan" <Bryan.Stone@amec.com>
Date: 10/01/2010 09:45 AM
Subject: PCBs: Former Pechiney Cast Plate Inc - Interim Cap

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Carmen,

As a follow-up to the voice message I left you earlier this week, we have a few additional questions regarding the "Interim Cap" described in item C.3.e of the Conditional Approval letter dated July 2, 2010. Specifically with regard to the verbiage in item C.3.e on pages 5 and 6 (paraphrased below):

Paragraph 1, bottom of page 5: states that the interim cap is to be placed atop crushed concrete containing PCBs below the approved cleanup level for surface/shallow soils (i.e.< 5.3 ppm), and that an interim cap can consist of concrete with PCBs below 1 ppm (< 1ppm).

Paragraph 2, at the top of page 6: states the interim cap that would prevent infiltration is to be placed atop crushed concrete containing PCBs "below" 1 ppm.

I arrive at a different conclusion regarding what needs to be covered by the interim cap when I read each of these paragraphs. Our proposed approach for placing the interim cap is consistent with the statements in paragraph 1. For clarification, we are proposing the following (and please reply if you disagree with our clarification):

□□ Placement of an interim cap consisting of crushed onsite concrete containing PCBs at concentrations less than 1 ppm (<1 ppm) over only those areas that have been backfilled with crushed onsite concrete containing PCBs at concentration greater than 1 ppm (>1 ppm) but less than 5.3 ppm (<5.3 ppm) or where soil remains at the surface with PCBs >1 ppm but less than the proposed cleanup goal of 5.3 ppm.

□□ This interim cap would consist of a reduced infiltration layer comprised of compacted crushed concrete containing PCBs at a concentration <1 ppm. The cap would be constructed with sloped upper surfaces to promote drainage to a BMP controlled storm water collection area as opposed to allowing ponding and infiltration to occur.

□□ Crushed concrete containing PCBs at concentrations <1 ppm are also proposed for use during site grading as unrestricted fill materials without the placement of an interim cap of any type over these materials.

A conceptual figure depicting the interim cap is attached.

We have also considered other options for the colorant dye marker. Rather than using a dye to demarcate the area where on-site crushed concrete containing PCBs at concentration >1 ppm but less than <5.3 ppm is placed, we are proposing to use an HDPE brightly colored mesh identifier layer. Details of the HDPE material are shown on the attached figure.

Please let me know if you would like to discuss further.

Thank you,

**Linda Conlan, PG | Senior II Geologist**
**AMEC Geomatrix, Inc.**

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If you receive this e-mail in error, please notify the sender by reply e-mail and delete and destroy the message.[attachment "Pechiney_Concept Interim Cap Constr Detail.pdf" deleted by Carmen Santos/R9/USEPA/US]